

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

INTERACTIVE  
COMMUNICATIONS  
INTERNATIONAL, INC. and  
INCOMM FINANCIAL  
SERVICES, INC.,

*Plaintiffs,*

v.

DAVID CHIU and the CITY AND  
COUNTY OF SAN FRANCISCO,

*Defendants.*

Civil Action No. 1:24-cv-05335-VMC

**CONSENT MOTION FOR EXTENSION OF PAGE LIMITS**

Defendants David Chiu and the City and County of San Francisco, with the consent of Plaintiffs Interactive Communications International, Inc., and InComm Financial Services, Inc., hereby move the Court to allow each party to file briefs that are ten (10) pages in excess of the 25-page limit contained in LR 7.1(D), and specifically, the motion to dismiss and opposition briefs not to exceed 35 pages. Pursuant to Section III(o) of the Hon. Victoria M. Calvert's Standing Order for Civil Cases, Defendants respectfully show as follows:

1. On November 20, 2024, Plaintiffs filed a Complaint against Defendants. Doc. 1. Exceeding 100 pages and containing 264 paragraphs, the

Complaint contains numerous factual allegations and legal claims that Defendants believe implicate the Court's jurisdiction, application of immunity, constitutional law issues, and several other defenses that are appropriate to raise in a motion to dismiss.

2. Therefore, Defendants intend to file a motion to dismiss and believe in good faith that they will need 10 additional pages in order to fully address the factual allegations and legal claims raised in the Complaint and present the defenses available to them.

3. On February 6, 2025, undersigned counsel reached out via email to Plaintiffs' counsel to request agreement to allow Defendants to file a brief containing an extra 10 pages, and informed Plaintiffs that Defendants would not oppose Plaintiffs having the same extended page limit for their opposition brief. Plaintiffs' counsel agreed to Defendants' request.

4. Therefore, Defendants and Plaintiffs respectfully move this Court to allow them to file motion to dismiss and opposition briefs not to exceed 35 total pages.

5. Defendants' deadline to respond to the Complaint is February 12, 2025. Doc. 10. Therefore, this motion to extend the page limit is timely under Judge Calvert's civil standing order.

For these reasons, Defendants and Plaintiffs submit that good cause exists to allow each party to submit motion to dismiss and opposition briefs not exceeding 35 pages. A proposed order is submitted via CM/ECF with this motion.

This 7th day of February, 2025.

**STIPULATED AND AGREED TO:** Respectfully submitted,

**/s/ Sarah Brewerton-Palmer**

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**CERTIFICATION OF FONT SIZE**

The foregoing was prepared in Times New Roman, 14-point font, approved by the Court in Local Rule 5.1(C).

**/s/ Lauren A. Warner**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 7, 2025, I electronically filed the foregoing **CONSENT MOTION FOR EXTENSION OF PAGE LIMITS** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

**/s/ Lauren A. Warner**